

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

United States District Court
Southern District of Texas
FILED

MAY 24 2016

David J. Bradley, Clerk

UNITED STATES OF AMERICA

§

§

v.

§

§

NOE BARBOSA, JR.

§

AMANDA MARIE BARBOSA

§

ERIC VLADIMIR MELENDEZ-

§

MARTINEZ

§

Criminal No. M-16-0363-S1

RUBEN MARROQUIN

§

ANDRES RUBEN MARROQUIN

§

JONATHON RIVERA-ALVARADO

§

ERIC PEREZ

§

ROSA CRISELDA MATA-CANTU

§

CARLOS BARBOSA

§

ELIZABETH PINTO

§

JUAN MUNOZ

§

SEALED SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Count One

From at least January of 2013 until the date of this indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

**NOE BARBOSA, JR.
AMANDA MARIE BARBOSA
ERIC VLADIMIR MELENDEZ-MARTINEZ
RUBEN MARROQUIN
ANDRES RUBEN MARROQUIN
JONATHON RIVERA-ALVARADO
ERIC PEREZ
ROSA CRISELDA MATA-CANTU
CARLOS BARBOSA
ELIZABETH PINTO
and
JUAN MUNOZ**

knowing and in reckless disregard of the fact that individuals who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to transport and move said aliens within the United States in furtherance of such violation of law, that is, from locations in the Rio Grande Valley of South Texas to other locations further north into the United States, by various means including but not limited to by motor vehicle and by foot.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

Count Two

On or about February 29, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**NOE BARBOSA, JR.
AMANDA MARIE BARBOSA
and
ERIC VLADIMIR MELENDEZ-MARTINEZ**

knowing and in reckless disregard of the fact that Otilio Vasquez-Gomez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near Pharr, Texas, to another location near Falfurrias, Texas, by means of a motor vehicle, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Three

From at least January of 2013 until the date of this indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendants,

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and
ELIZABETH PINTO**

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jury, to commit the following offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

- a. to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce which involved the proceeds of a specified unlawful activity, that is, the transportation of illegal aliens, an offense punishable under Title 8 of the laws of the United States as alleged in Counts One and Two of this indictment, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);
- b. to knowingly transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds involving the proceeds of specified unlawful activity, to wit: the transportation of illegal aliens, an offense punishable under Title 8 of the laws of the United States as alleged in Counts One and Two of this indictment, from a place in the United States to a place outside the United States and to a place in the United States from a place outside the United States, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and

transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); and,

- c. to knowingly transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, from a place in the United States to a place outside the United States and to a place in the United States from a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, that is, the transportation of illegal aliens, an offense punishable under Title 8 of the laws of the United States as alleged in Counts One and Two of this indictment, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

In violation of Title 18, United States Code, Section 1956(h).

NOTICE OF CRIMINAL FORFEITURE
18 U.S.C. § 982(a)(1)

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States of America gives notice to the defendants,

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and
ELIZABETH PINTO

that upon conviction of an offense in violation of Title 18, United States Code, Section 1956 as charged in Count Three of this Indictment, all property, real or personal, involved in such offense, or all property traceable to such property, is subject to forfeiture.

